



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

APR 07 2016

Mr. Keith Swarts
Director of Business Services
5017 ADC
University of Nebraska Medical Center
Omaha, Nebraska 68198-5060

RE: Risk-Based PCB Abatement Plan for the former Omaha Steel Castings property
Omaha, Nebraska

Dear Mr. Swarts:

The U.S. Environmental Protection Agency Region 7 has reviewed the PCB Abatement Plan (workplan) dated March 16, 2016, regarding proposed cleanup of polychlorinated biphenyl compound contaminated transformer pads at the former Omaha Steel Castings Property in Omaha, Nebraska. The workplan request was for removal and disposal of the pads followed by confirmation sampling in accordance with 40 CFR 761.61(c) approval requirements. The EPA has determined the proposed cleanup will not pose an unreasonable risk of injury to human health or the environment and is approving the workplan with the following conditions:

1. UNMC shall provide notification to the EPA via email at limesand.kurt@epa.gov no less than seven days prior to commencing the approved cleanup activities.
2. UNMC shall submit any modifications or additions to the workplan to the EPA via email for review and approval prior to implementation.
3. TSCA requires that in order to use composite soil samples for verification, the laboratory analytical results must demonstrate that the verification samples are less than the cleanup goal divided by the number of aliquots used to create the composite sample; in this case, the laboratory must be able to quantitatively demonstrate the presence of 0.25 milligrams per kilogram total PCBs in the composite sample. If the laboratory cannot achieve that reporting limit, discrete rather than composite samples should be submitted, and the laboratory must achieve a reporting limit of 1.0 milligrams per kilogram, the TSCA regulatory standard for unrestricted site use.
4. UNMC shall submit a final report to the EPA within 60 days of completion of the approved activities. This plan shall document all activities performed in accordance with the approved plan and any deviations that may have occurred during implementation of the approved plan.

Deliverables shall be submitted to Kurt Limesand at the address on this letterhead. Electronic submissions can be emailed to limesand.kurt@epa.gov.



Printed on Recycled Paper

If you have any questions, please contact Kurt Limesand, of my staff, by phone at (913) 551-7184 or by email at limesand.kurt@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Becky Weber", with a stylized, flowing script.

Becky Weber
Director
Air and Waste Management Division

cc: Megan R. Hughes, Terracon Consultants, Inc., Omaha, Nebraska